



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

SR-6J

August 7, 2012

VIA ELECTRONIC MAIL AND CERTIFIED MAIL

Weyerhaeuser Company
Attention: Richard Gay
810 Whittington Ave.
Hot Springs, AR 71902

Re: Plainwell Mill, Operable Unit #7, Allied Paper, Inc./Portage Creek/Kalamazoo River
Superfund Site – Comments on Summary of Additional Remedial Investigation Activities
PCB-Impacted Soil in the Area of MW-16

Dear Mr. Gay:

Pursuant to the Consent Decree for the Design and Implementation of Certain Response Actions at Operable Unit #4 and the Plainwell Inc. Mill Property of the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site (Site), Conestoga-Rovers & Associates, Inc. (CRA), Weyerhaeuser Company's (Weyerhaeuser) environmental consultant, submitted a revised Remedial Investigation (RI) Report on April 20, 2012 for Weyerhaeuser. The revised RI Report provided recommendations for additional activities to be completed at the Site to address potential data gaps including the delineation of polychlorinated biphenyl (PCB) impacts identified in soil in the vicinity of MW-16 during the RI.

The additional RI activities were conducted on the northeastern portion of the Site in redevelopment area Commercial Area 4, in the vicinity of monitoring well MW-16, and were summarized in a memorandum submitted by CRA to the United States Environmental Protection Agency (EPA) on June 22, 2012.

After reviewing the June 22, 2012 submittal, EPA has the following comments:

GENERAL COMMENT

In Section 2.0 (Page 2-1), the text states that soil borings were advanced to 10 feet below ground surface (bgs) and groundwater was encountered at 8 to 10 feet bgs. The conclusion section (Section 6.0) states that some of the highest PCB concentrations in soil were detected just above the water table; however, no groundwater samples were collected. Because PCBs were not detected at elevated concentrations in soil deeper than 6 feet bgs at locations MW-16 and subsequent adjacent soil boring SB-2020, it is not surprising that PCBs were not detected in groundwater at well MW-16. Absence of PCBs in groundwater at well MW-16 does not preclude

the possibility of impacts on groundwater at other locations where PCB concentrations were elevated in soil just above the water table. Groundwater samples should be collected at locations where PCBs were detected in soil just above the water table, including locations between MW-16 and the Mill Race to assess whether groundwater has been impacted in this area.

SPECIFIC COMMENTS

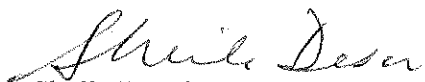
1. **Section 2.1, Page 2, Paragraph 3.** The text states that each soil interval was examined for visual/olfactory evidence of impacts. The results presented in Section 5.0 should be revised to discuss whether any impacts were observed at each of the depth intervals sampled.

2. **Section 6.0, Page 5, Paragraph 5.** The conclusions section should include an explanation or statement regarding the source(s) and site-relatedness of the identified PCB contamination. The measured PCB concentrations are relatively high, localized, and unlikely to be associated with other non-site-related activities. The text should discuss whether any site-related pipes, tanks, or other operational pieces (units) are present (or formerly were present) in this area that might be related to the identified PCB contamination.

3. **Section 6.0, Page 5, Paragraph 5.** The text should either conclude that the PCB contamination extends to the Mill Race or recommend advancement of additional borings closer to the Mill Race in an attempt to establish an alternate boundary of the extent of contamination. In addition, the extent of contamination south/southeast of boring SB-2030 is not defined. The text should be revised either to indicate the need for additional borings in this area for defining the extent of PCB impacts or to provide rationale for no further sampling.

Please submit a revised memorandum that incorporates EPA's comments within 30 days of receipt of this letter for review. If you have any questions or comments regarding this letter, please contact me at (312) 353-4150 or via email at desai.sheila@epa.gov.

Sincerely,



Sheila Desai

Remedial Project Manager

cc: J. Saric, U.S. EPA (e-mail)
L. Kirby-Miles, U.S. EPA (e-mail)
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